

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 22

COSCO NORTH AMERICA, INC.¹

Employer

and

CASE 22-RC-12236

**INTERNATIONAL LONGSHOREMEN'S
ASSOCIATION, AFL-CIO**

Petitioner

DECISION AND DIRECTION OF ELECTION

1. Introduction

Petitioner, International Longshoremen's Association, AFL-CIO, filed a representation petition pursuant to Section 9(c) of the National Labor Relations Act. At the hearing in this matter, the Petitioner amended its petition to include in the unit it seeks to represent three Port Captains/Marine Operation Vessel Coordinators (Port Captains)² and one Hazmat Specialist³ employed by Cosco North America, Inc. (the Employer) at its Secaucus, New Jersey facility, the only facility involved herein. The Employer argues that the petitioned-for unit is inappropriate because the four employees sought are all managerial employees. The Employer also argues that, in any event, the Port Captains and Hazmat Specialist do not share a community of

¹ The name of the Employer appears as amended at the hearing.

² The record reflects that Port Captains are also referred to as Stowage Line Managers.

³ The record reflects that the Hazmat Specialist is also referred to as the National Hazmat Manager or the Hazardous Materials Manager.

interest sufficient to include them in the same unit. There is no history of collective bargaining between the parties. Based on the following facts and analysis, I find the Hazmat Specialist to be a manager, but not the Port Captains, and order an election as set forth below.

Pursuant to the provisions of Section 3(b) of the Act, the Board has delegated its authority in this proceeding to the undersigned.

Upon the entire record in this proceeding,⁴ the undersigned finds:

1. The hearing officer's rulings made at the hearing are free from prejudicial error and are hereby affirmed.
2. The Employer is engaged in commerce within the meaning of the Act; and it will effectuate the purposes of the Act to assert jurisdiction herein.⁵
3. The labor organization involved claims to represent certain employees of the Employer.⁶
4. A question affecting commerce exists concerning the representation of certain employees of the Employer within the meaning of Section 9(c)(1) and Section 2(6) and (7) of the Act.
5. The following employees of the Employer constitute a unit appropriate for the purpose of collective bargaining within the meaning of Section 9(b) of the Act:

**All full-time and regular part-time Port Captains/Marine
Operation Vessel Coordinators employed by the Employer**

⁴ Briefs filed by the parties have been duly considered.

⁵ The parties stipulated that during the preceding twelve month period, the Employer purchased and received at its Secaucus, New Jersey facility goods valued in excess of \$50,000 directly from suppliers located outside the State of New Jersey. Accordingly, I find that the Employer is engaged in commerce within the meaning of the Act. *Siemons Mailing Service*, 122 NLRB 81 (1959).

⁶ The parties stipulated and I find that the Petitioner is a labor organization within the meaning of Section 2(5) of the Act.

at its Secaucus, New Jersey facility, excluding all office clerical employees, managerial employees, guards and supervisors as defined in the Act, and all other employees.

2. Facts

a. Background

The Employer is a general shipping agent involved with the North American operations of its principal, Cosco Container Lines (COSCON), a commercial maritime carrier located in Shanghai, China. COSCON owns and operates over 500 vessels that are used to transport containers containing cargo of its customers to various ports in Asia, the United States and Europe. While the Employer has its headquarters in Secaucus, New Jersey, it also has offices and/or operations at various ports along the East Coast, as well as on the West Coast, and at other locations. In the New York/New Jersey area, COSCON's vessels berth at the Maher Terminal (Terminal) located in the port of Elizabeth, New Jersey, where other shipping companies' vessels are also berthed.

Robert Krekel, Senior Vice President of Operations, heads the Employer's Operations Department. Sam Martinovic, the Employer's Assistant Vice President for Marine Operations, heads the Marine Operations Division, which includes the East Coast Marine Stowage Center. The Stowage Center is located on the third floor of the Secaucus facility. Working in the Stowage Center and reporting to Martinovic are Captain Wong, General Manager of Marine Operations and Captain Liu, General Manager of the East Coast Stowage Center. Reporting directly to Captains Wong and Liu in Secaucus are Port Captains Patrick Zapolski, Christian Muscarella and Stephen Bendo. Zapolski, who has more seniority than Muscarella and Bendo, also has the title of Assistant General Manager, East Coast Marine Stowage Center, although there

is no record evidence that he has any more responsibility or authority than do the other Port Captains. The record reflects that the Employer employs three other Port Captains who work in the ports of Norfolk, Virginia and Charleston, South Carolina, as well as Port Captains who work on the West Coast, none of whom are sought by the Petitioner.

The Employer's East Coast Marine Stowage Center is responsible for the loading and unloading of COSCON vessels at various North American East Coast ports, including the Terminal at the port of Elizabeth, New Jersey. The Employer contracts with the Terminal for the provision of services such as the use of berths for docked vessels and the supplying of stevedores and cranes for the loading and unloading of vessels. Additionally, the Employer makes prior arrangements with certain piloting and tugboat companies for their assistance in bringing vessels into and out of berths, when necessary.

b. Port Captains

The record reflects that Port Captains Zapolski, Muscarella and Bendo all possess Bachelor Degrees in Marine Transportation from maritime colleges. They also are licensed by the United States Coast Guard to operate vessels as either Third Mates or First Mates.

Zapolski, Muscarella and Bendo work on the 3rd floor of the Employer's Secaucus facility with Captains Wong and Liu. Assistant Vice President Martinovic works on the 4th floor, where other executive managers work. COSCON currently operates three shipping service lines, each utilizing COSCON vessels that regularly call upon North American East Coast ports. Each Port Captain is responsible for one of the particular service lines and the vessels sailing on that line. When a vessel for

which they are responsible is coastwise (in port or between East Coast ports), the Port Captains are “on call” and must be reachable 24 hours a day to deal with any problems or issues that may arise.

Port Captains do not have frequent contact with Assistant Vice President Martinovic, but they have regular contact with Captains Wong and Liu, who work on the same floor with them. They advise Wong and Liu as to the status of vessels in port and will consult with them, as necessary, if they have questions or when issues arise that are not routine.

In the performance of their functions, Port Captains follow an Operating Procedures Manual prepared by the Employer that describes the duties and procedures they are to follow. In this connection, Port Captains prepare Coastwise Schedules for vessels expected to arrive at East Coast ports. These schedules are prepared shortly before the vessels arrive. They indicate the expected dates and times of arrival and berthing and departure times for vessels for each East Coast port of call, as well as the expected number of container “moves” (loading or unloading) at each port and when the cargo activity will begin and end. The Coastwise Schedules prepared by Port Captains utilize information contained in pro forma schedules or long term schedules generated by COSCON in Shanghai, such as the expected times of arrival and departure of the vessels and the number of containers to be moved. In preparing the Coastwise Schedules, Port Captains determine the expected amount of time needed to unload or load vessels, factoring in, among other things, the number of containers to be moved, the expected number of stevedore labor gangs and cranes that will be necessary and available to do the moving and the average number of containers that can be moved by each labor gang per hour. In normal circumstances,

each labor gang is expected to move 25 containers per hour, utilizing a crane. Port Captains use their experience and judgment in making these determinations.

Port Captains do not have authority, on their own, to change the vessels overall schedules. For example, Port Captain Zapolski testified as to occasions when vessels arrived late and Port Captains were told by either Captain Wong or Liu that empty containers should still be loaded on the vessels, even though it would delay their departure. On other occasions, they may be told to omit a port if, for example, the vessel has had a breakdown.

Port Captains order labor and cranes from the Terminal to unload or load vessels after their arrival. As noted above, the Employer has entered into a contract with the Terminal for the provision of these services, as needed, at a specific cost. At times, because of the high demand for labor caused by the needs of the Employer and other shippers, the Terminal will advise a Port Captain that it cannot supply the number of labor gangs requested. The Port Captain will report this to one of his superiors who may contact the Terminal directly and request, at times successfully, to have the labor request filled.

Port Captains also contact various contractors or vendors to schedule services or deliveries, such as pilot companies, tugboat companies and bunker fuel suppliers, with whom the Employer has made previous arrangements. Port Captains have no discretion as to which vendors or contractors to contact, as this has been prearranged. They also have no authority to place orders for bunker fuel but merely make arrangements for its delivery, after it has already been ordered by the Employer's principals in Shanghai.

Port Captains are responsible for preparing Stowage Plans showing how cargo

is to be loaded or unloaded from vessels. They attempt to load the vessels efficiently and to their maximum capacity, while maintaining stability. Stowage considerations include container size, weight, type, cargo destination, commodity, maximum tonnage and vessel stability. Schematics and computerized programs are utilized by the Port Captains to assist them in accomplishing this task. Most of the containers transported by vessels are standard sizes. Oversized or awkward containers, as well as containers that must be refrigerated (known as reefers) may also be transported. While Port Captains utilize their experience and judgment to complete the Stowage Plans, they must follow company policies with respect to their design. Port Captains also consider whether cargo that is to be transported is hazardous. If so, they must follow Federal Regulations, the International Maritime Code and internal policies as to the manner in which it is to be stowed. Stowage Plans may also be changed by the vessel's Captain or Chief Mate who, because they have ultimate responsibility for the safety of their vessels, may override decisions of the Port Captains. This may occur, for example, if the Captain or Chief Mate believes that the Stowage Plan creates a vessel stability problem or that certain cargo is too hazardous to carry.

Port Captains review invoices received concerning labor costs. By doing so, they confirm that the services billed for were actually provided and that the computations are correct. Port Captains do not have authority to negotiate rates. Confirmations by Port Captains on the invoices are necessary before payments will be made.

The record reflects that COSCON has entered into vessel sharing agreements (VSAs) with other shipping companies. These agreements detail the procedures to be followed, including the cut-off dates and times for the arrival of cargo, the number of

containers each company is allowed to have loaded onto the vessels, steps to be taken with respect to the transport of hazardous or awkward cargo and a priority system to be followed by the carriers when there is too much cargo to be stowed. Port Captains, who played no part in negotiating these agreements, must adhere to them and are, thereby, limited in their discretion as to stowage decisions.

Port Captains regularly travel to the Terminal to board vessels when they are in port in order to meet with the vessel's Captain or to take care of other vessel related matters.⁷ They also deal with the United States Coast Guard concerning vessel safety and security and, at times, with other governmental agencies or vessel husbandry services, concerning the vessel's imports or exports or its staff.

Port Captains also prepare Terminal Departure Reports (TDR) after a vessel leaves a particular port and a Regional Departure Report (RDR) after a vessel completes its calls on the East Coast Region, for which the Port Captain is responsible. The reports summarize the vessel's activity at the port or within the Region, as applicable. It appears that these reports are reviewed periodically by Port Captains to determine whether the Employer's objectives of schedule integrity, production and vessel utilization are being met.

The record also reflects that Port Captains do not attend regularly scheduled management meetings. Such meetings take place weekly and are attended by, among others, Assistant Vice President Martinovic and Captains Wong and Liu.

c. Hazmat Specialist⁸

The Employer employs Hazmat Specialist John La Gorce in its Shipment

⁷ They are provided with a monthly car allowance for this purpose.

⁸ Hazmat refers to hazardous materials.

Management Division. That division, located on the 4th floor of the Secaucus facility, has company-wide responsibilities. La Gorce reports directly to the head of the division, Assistant Vice President Robert Harden. Besides hazardous materials, the division also includes booking and traffic operations as well as information services.

La Gorce has a Bachelor of Arts Degree as well as a Bachelor of Science Degree from a maritime college in Marine Transportation. He is licensed by the United States Coast Guard to operate vessels as a Third Mate.

As the Employer's Hazmat Specialist, La Gorce responds to hazmat inquiries from various groups of employees, including booking, traffic, customer service and Port Captains. He also responds to inquiries received from management at all levels. La Gorce reviews shipments for export and import based on information provided by the customer service group. La Gorce receives and reviews files showing where hazardous materials are stowed on each vessel. He insures that shipments administered by Port Captains are in compliance with the Code of Federal Regulations (CFR), the International Maritime Dangerous Goods Code (IMDG) and other rules and regulations pertaining to hazardous materials.

The record reflects that hazardous materials are a serious concern to the Employer because of safety and because of its potential exposure to legal liability.

La Gorce was initially hired by the Employer in 1997 as a marine/hazmat coordinator and worked in the Marine Operations Division. As such, he performed Port Captain functions in addition to handling hazmat duties. While initially La Gorce dealt with hazmat issues only for vessels to which he had stowage responsibilities, because of his interest in the area, he began to handle hazmat

responsibilities for other vessels as well. Since 1998, La Gorce has no longer performed Port Captain duties and is solely responsible for hazmat on a company-wide basis. He is also referred to as the Employer's National Hazmat Manager. Since 1998, La Gorce was transferred from the Marine Operations Division to the Shipment Management Division.

After his transfer, Assistant Vice President Harden asked La Gorce to prepare a Hazardous Cargo Policy Manual detailing the Employer's policies with respect to hazardous cargo. Until then, the Employer did not have any formal or comprehensive written company-wide hazardous materials policies.

The record reflects that the Hazardous Cargo Policy Manual prepared by La Gorce contains both material that he gathered from other sources and original material. Thus, it contains a compilation of various Federal regulations gathered from other sources that must be adhered to by the Employer's hazardous material employees⁹ in handling and documenting hazardous cargo. It also contains material formulated and authored by La Gorce that has become part of the Employer's policies. For example, the Manual requires seven reviews of each hazmat shipment before it is loaded and describes those reviews. It also sets forth a series of steps to be taken in response to an emergency hazmat spill and lists La Gorce, described in the Manual as the Hazardous Material Manager, as the first person to be contacted in such an event. It also provides that La Gorce will coordinate all necessary paperwork, follow-up and accounting in such an event. The Manual written by La Gorce also provides that he is to be notified by department managers of the hiring of new

⁹ Hazardous material employees are employees who, in some respect, deal with the processing and/or handling of hazardous cargo and its documentation. Government regulations require that they be trained and certified to do so.

hazardous material employees and by the Human Resources Department when such employees are terminated. The purpose of this is that he can keep accurate records to monitor employees' training. The Manual also provides for an internal and external "Compliance Review Process" to be conducted by La Gorce, which allows him to determine which employees, if any, need additional hazmat training, or whether employees should be reassigned to a non-hazmat job.

After its completion by La Gorce, the Hazardous Cargo Policy Manual was presented to and approved by the Employer's executive management, including Harden, without substantial change. The Employer then posted the Manual on its intranet (COSCONET), where it still remains and is accessible to all employees. The record reflects that employees frequently access this information.

La Gorce testified that the Hazardous Materials Manual he produced does not accurately reflect the Employer's actual policies and that the policies described therein are not being followed or enforced. Harden, however, testified that the Manual is the Employer's actual policy for hazardous materials, that it is disseminated to employees for them to follow and that if La Gorce is not policing its compliance, he is in dereliction of his responsibilities. There is no evidence that the Employer advised La Gorce that he was not to follow the requirements of the Manual.

Since he became National Hazmat Manager, La Gorce has also been assigned the responsibility of planning and implementing hazardous material training for all of the Employer's employees who handle or document hazardous cargo, including supervisors. La Gorce developed most of the training materials used, although some of it was purchased from an outside vendor. He also conducted training for the Employer in various cities, including Secaucus, New Jersey, Seattle, Washington,

Chicago, Illinois and Houston, Texas. Although Harden accompanied La Gorce on his out-of town training trips, he did not participate in the training. After successfully completing training, including the taking of written tests, employees receive documents signed by La Gorce certifying such. La Gorce also maintains records as to which hazmat employees have received training and certification and those that have not.

The record reveals that the Employer is currently lagging in the training of its employees regarding hazmat issues, as La Gorce has not conducted training since 2000. La Gorce testified that this was a result of his heavy workload and other obligations. While there is some reference in the record to the possibility that an outside vendor may have conducted some training in the interim, there is no evidence that the Employer has determined to remove training from among La Gorce's responsibilities.

Harden testified that he gives La Gorce much independence in the performance of his functions and that La Gorce will only report to him on an "as needed" basis. La Gorce and Harden do, on occasion, communicate to each other via e-mail when issues arise. A review of the e-mails in evidence does not demonstrate any limitations placed by Harden on La Gorce's independence. In fact, the record reflects that La Gorce, who is more knowledgeable than other employees with respect to hazardous materials, does not normally have to check with anyone else before he makes decisions in his role as hazmat specialist.

While La Gorce does not attend regularly scheduled management meetings, he has attended some management meetings. Specifically, he testified as to a meeting he attended to discuss hazmat issues. Harden was present, as well as representatives of

companies with whom the Employer has entered into VSA agreements. Additionally, the record reflects that La Gorce has attended a course specifically arranged by the Employer for its managers concerning workplace harassment.

The record does not disclose the frequency of La Gorce's contact with booking, traffic or customer service employees. La Gorce testified that his contact with Port Captains, which may be via e-mail or faxes, occurs weekly, although sometimes daily. There is also testimony as to one instance when La Gorce worked closely with a Port Captain for about a month to help resolve a problem that the Port Captain was having with the Coast Guard.

While La Gorce normally works regular hours, he is also "on call" 24 hours a day so that he can be reached at any time in the event of a hazmat emergency. Unlike Port Captains, La Gorce does not receive a monthly car allowance.

3. Analysis

Although the Act makes no specific provision for managerial employees, under Board policy, this category of personnel has long been excluded from coverage under the Act. *Ladies Garment Workers v. NLRB*, 339 F.2d 116, 123 (2d Cir. 1964); *Palace Dry Cleaning Corp.*, 75 NLRB 320 (1947); *Ford Motor Co.*, 66 NLRB 1317 (1946).

In *NLRB v. Yeshiva University*, 444 U.S. 672 at 682-683 (1980), the Supreme Court described managerial employees as follows:

Managerial employees are defined as those who "formulate and effectuate management policies by expressing and making operative the decisions of their employer." These employees are "much higher in the managerial structure" than those explicitly mentioned by Congress which "regarded [them] as so clearly outside the Act that no specific exclusionary provision was found necessary." Managerial employees must exercise discretion within, or even independently of, established employer policy and must be aligned with management. Although the Board has established no firm criteria for

determining when an employee is so aligned, normally an employee may be excluded as managerial only if he represents management interests by taking or recommending discretionary actions that effectively control or implement employer policy.

The reason managerial employees are exempted from the coverage of the Act is "that employees who exercise discretionary authority on behalf of the employer will not divide their loyalty between employer and union." Above at 687-688.

While work that is based upon technical and professional competence may necessarily involve the exercise of discretion and judgment, technical and professional employees who exercise such discretion and judgment are not necessarily managerial employees. *General Dynamics Corp.*, 213 NLRB 851, 857-58 (1974). Technical and professional employees are not vested with managerial authority merely by virtue of their status because work performed in that status may have a bearing on the direction of their employer. *Id.* at 858.

The decision as to whether an employee is a manager is made on a case-by-case basis depending upon the degree of discretion and authority exercised by the disputed employee. *Drukker Communications, Inc.*, 258 NLRB 734, 743 (1981); *Curtis Industries*, 218 NLRB 1447, 1448 (1975)(dissenting opinion). However, employees do not acquire managerial status by making decisions or exercising discretion "within established limits set by higher management." *Holly Sugar Corp.*, 193 NLRB 1024, 1026 (1971). Even the authority to exercise considerable discretion does not render an employee managerial where his discretion must conform to an employer's established policy. *Albert Lea Cooperative Creamery Association*, 119 NLRB 817, 822-23 (1957).

Based on the above and the record as a whole, I find that Port Captains are not managerial employees. Many of the functions they perform appear to be routine.

While Port Captains do exercise some discretion in the performance of their duties, it does not appear to be extensive. Further, their exercise of discretion must conform to the Employer's established policies, including those contained in the Operating Procedures Manual, Federal regulations and the requirements of VSAs. The evidence reveals that Port Captains lack the requisite discretion and judgment independent of established policies necessary to confer managerial status upon them. *NLRB v Yeshiva University*, above at 682-83. Further, the fact that they regularly consult with their supervisors, Captains Wong and Liu, concerning non-routine matters is inconsistent with managerial status. Additionally, any discretion that they do exercise appears to be a function of the technical and professional nature of their work, and is not managerial discretion. *General Dynamics*, above at 857-858. I find no evidence that Port Captains formulate the Employer's business policies. See also, *Southwest Airlines Co.* 239 NLRB 1253 (1979), where decisions made by flight dispatchers, like those made by Port Captains here, were not considered to be managerial decisions.

I reject the Employer's argument that by ordering certain services and approving charges for those services Port Captains commit their Employer's credit to such an extent that they should be considered managerial employees. Unlike the employees in *Eastern Camera and Photo Corp.*, 140 NLRB 569, 572 (1963) and *Concepts and Designs, Inc.*, 318 NLRB 948, 957 (1995), *enforced*, 101 F. 3rd 1243 (8th Cir. 1996), Port Captains have been specifically pre-authorized to order services, as needed, from specific providers with whom the Employer has made arrangements and negotiated costs. See *Moore-McCormack Lines, Inc.*, 181 NLRB 510, 511 (1970) where the Board, in rejecting the Employer's argument that the passenger vessel coordinator therein was a managerial employee because he pledged the Employer's

credit, found that his pledge of credit was perfunctory and limited by prior guidelines.

There remains for consideration whether Hazmat Specialist John La Gorce is a managerial employee who should be excluded from the collective bargaining unit found appropriate herein or whether he is non-managerial employee who shares a community of interest with the Port Captains and can be included in a unit with them. I am persuaded from the record that La Gorce is a managerial employee and, as such, must be excluded from the unit. In so finding, I note that La Gorce is in charge of hazmat related matters on a national basis. The record also reflects that he has much independence and discretion in the performance of his duties. Significantly, La Gorce participated directly in the establishment of the Employer's hazmat policies and authored the Hazmat Cargo Policy Manual, which is widely disseminated to employees and contains much original information. Further, his role in the development of training material and his training and certifying of employees as well as supervisors is a significant indicator of his managerial status. *Miller Electric Company*, 301 NLRB 294, 298-99 (1991); *Sutter Community Hospital of Sacramento, Inc.*, 227 NLRB 181, 193 (1976). Accordingly, I shall exclude him from the unit.¹⁰

DIRECTION OF ELECTION

An election by secret ballot shall be conducted by the undersigned among the employees in the unit found appropriate at the time and place set forth in the notice of election to be issued subsequently subject to the Board's Rules and Regulations. Eligible to vote are employees in the unit who were employed during the payroll period ending immediately preceding the date of this Decision, including employees

¹⁰ As I have determined that La Gorce is a managerial employee who should be excluded from the unit, it is unnecessary for me to determine whether he shares a sufficient community of interest with the Port Captains to be included with them in the same unit.

who did not work during that period because they were ill, on vacation or temporarily laid off. Also eligible are employees engaged in an economic strike that commenced less than 12 months before the election date and who retained their status as such during the eligibility period and their replacements. Those in the military services of the United States who are employed in the unit may vote if they appear in person or at the polls. Ineligible to vote are employees who have quit or been discharged for cause since the designated payroll period, employees engaged in a strike who have been discharged for cause since the commencement thereof and who have not been rehired or reinstated before the election date and employees engaged in an economic strike which commenced more than 12 months before the election date and who have been permanently replaced. Those eligible to vote shall vote whether or not they desire to be represented for collective bargaining purposes by the **International Longshoremen's Association, AFL-CIO.**

LIST OF VOTERS

In order to ensure that all eligible voters may have the opportunity to be informed of the issues in the exercise of their statutory right to vote, all parties in the election should have access to a list of voters and their addresses which may be used to communicate with them. *Excelsior Underwear, Inc.*, 156 NLRB 1236 (1966); *NLRB v. Wyman-Gordon Company*, 394 U.S. 759 (1969). Accordingly, it is hereby directed that within seven (7) days of the date of this Decision, two (2) copies of an election eligibility list containing the full names and addresses of all the eligible voters in the unit found appropriate above shall be filed by the Employer with the undersigned, who shall make the list available to all parties to the election. *North Macon Health Care Facility*, 315 NLRB 359 (1994). In order to be timely filed, such

list must be received in NLRB Region 22, 20 Washington Place, Fifth Floor, Newark, New Jersey 07102, on or before **November 1, 2002**. No extension of time to file this list shall be granted except in extraordinary circumstances, nor shall the filing of a request for review operate to stay the requirement here imposed.

RIGHT TO REQUEST REVIEW

Under the provision of Section 102.67 of the Board's Rules and Regulations, a request for review of this Decision may be filed with the National Labor Relations Board, addressed to the Executive Secretary, 1099 14th Street, N.W., Washington, DC 20570-0001. The Board in Washington must receive this request by **November 8, 2002**.

Signed at Newark, New Jersey this 25nd day of October 2002.

J. Michael Lightner,
Acting Regional Director
NLRB Region 22
20 Washington Place
Fifth Floor
Newark, New Jersey 07102

177-2401-6700
460-5033-7500